



CitiCable,
Office of Communication,
City of Cincinnati
801 Plum Street Suite 28
Cincinnati Ohio, 45202

8/5/13

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)*

Dear Commissioners:

CitiCable submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

CitiCable is Government Access Channel for the City of Cincinnati. Our programming is available to 60,000 subscribers in the City of Cincinnati. We provide 10-15 Hours of live *Closed Captioned* City of Cincinnati Council meetings and their committees a week. Plus Numerous replays of these meeting totaling over 100 hours a week of Closed Captioned programming. In addition we carry 10-20 hours a week of State and Federal programming that is captioned. These programs Include The State of Ohio, Soldiers Journal, Wild Ohio, Our Ohio, Ohio State Fair.

The onscreen video programming guide of our multichannel video programming distributor (MVPD), Time Warner Cable, does not provide a label or symbol indicating that this program [OR these programs] have closed captions. In fact the on screen guide that comes on as you tune to our channel refers to our channel as EWTN, a Religious Channel with the description of what is on their station. We have program descriptions and accessibility information readily available for our programs with accessibility options such as closed captions.

This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). We have been consistently informed from TWC that they cannot change this information. Viewers cannot determine from the MVPD's video programming guide what our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

We have been informed that our channel is going to be moved from the basic tier to the digital realm. Without specific information on the guide for our programming how will anybody find out what is on our channel ?

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

Steven Sobel
CitiCable/ City of Cincinnati
801 Plum Street Suite 28
Cincinnati, Ohio 45202